



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

July 18, 2016

Eduardo T. De Mesa
Chief, Planning Division
U.S. Army Corps of Engineers, Los Angeles District
915 Wilshire Blvd., Suite 930
ATTN: Kirk Brus, Environmental Coordinator
Los Angeles, California 90017

Subject: Draft Integrated Feasibility Report with Environmental Impact Statement for the Little Colorado River Winslow, Arizona Flood Risk Management Project, Navajo County, AZ (CEQ #20160121)

Dear Mr. De Mesa:

The U.S. Environmental Protection Agency has reviewed the Draft Integrated Feasibility Report with Environmental Impact Statement for the Little Colorado River Winslow, Arizona Flood Risk Management Project pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

In the Draft EIS, the U.S. Army Corps of Engineers evaluates alternatives to reduce flood risks in and near the City of Winslow, Arizona from the Little Colorado River. The Corps has identified Alternative 10.1 as the Tentatively Selected Plan and the NEPA Preferred Alternative. This alternative includes partial removal and reconstruction of several levee segments, including a setback levee; improving flood conveyance under a railroad bridge; construction of a new levee segment; and improving the existing flood warning system. EPA appreciates the Corps' effort to maintain the river's access to the active floodplain, specifically with the construction of a setback levee, where appropriate, and the avoidance of measures that would channelize the river. We also appreciate that, even though the project area is in attainment of all National Ambient Air Quality Standards, the project design includes measures to minimize truck haul distances for borrow and disposal activities through the reuse of materials and identification of sources within and near the project area. We further commend the Corps for requiring project activities to be timed so as to avoid impacts to fish and migratory bird species and to minimize the need for dewatering activities within the river's channel.

Based on our review of the Draft EIS, we have rated Alternative 10.1 as *Lack of Objections (LO)*; see attached "Summary of EPA Rating Definitions"). EPA notes that the Draft EIS includes a discussion of consultation with tribes in the project area. We encourage the Corps to continue this consultation and document the results of it in the Final EIS. We also note that several alternatives, including the preferred alternative, would include reseedling and revegetation measures after the removal of invasive salt cedar trees. EPA recommends that the Final EIS include a monitoring plan to ensure the success of these revegetation efforts, a list of native species to be used, and the proposed sources for seeds or plants.

EPA appreciates the opportunity to review this Draft EIS. When the Final EIS is released for public review, please send one copy to the address above (mail code: ENF-4-2). If you have any questions, please contact me at (415) 972-3521, or contact Jean Prijatel, the lead reviewer for this project, at (415) 947-4167, or prijatel.jean@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kathleen Martyn Goforth', with a stylized flourish at the end.

Kathleen Martyn Goforth, Manager
Environmental Review Section

Enclosure: Summary of EPA Rating Definitions

SUMMARY OF EPA RATING DEFINITIONS*

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

ADEQUACY OF THE IMPACT STATEMENT

"Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

"Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment.